

- Blood
- Sheldrake (SF)
10.4



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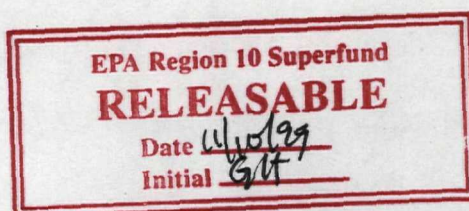
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MEMORANDUM

CH2M HILL

TO: Armina Nolan/EPA Air Compliance
Earl Liverman/EPA-Coeur d'Alene
Howard Blood/EPA
Tom Wise/Converse

COPIES: File

FROM: Joan Stoupa/CH2M HILL

DATE: June 29, 1995

SUBJECT: Asbestos Abatement Compliance Reporting Procedures (DRAFT)

PROJECT: 106356.03.05

RESPOND
BY: Noon, Thursday, July 6 with written or verbal comments

This memorandum summarizes proposed reporting procedures for asbestos compliance monitoring to be conducted by CH2M HILL's subcontractor, Converse-Bison at the Bunker Hill Superfund site during the asbestos abatement and demolition activities of the Industrial Complexes (Zinc Plant and Lead Smelter). The compliance monitoring technical support is provided to EPA through CH2M HILL's ARCSWEST contract with EPA Region 10.

PROJECT ORGANIZATION

The project organization, as it relates to compliance monitoring, is shown on Figure 1. For the Bunker Hill Industrial Complex demolition, EPA is the lead agency with overall program management responsibilities. Earl Liverman serves as On Site Coordinator (OSC) for EPA.

The U.S. Army Corps of Engineers has been tasked by EPA to implement the Industrial Complex demolition remedial action. Morrison Knudsen (MK) is the USACE's remedial contractor.

EPA's regulatory compliance for asbestos abatement is administered by Armina Nolan/EPA-Seattle. Becky Goehring/Westar-Boise, a subcontractor to EPA Region 10, provides Idaho-based support to EPA for asbestos compliance monitoring.

COMPLIANCE MONITORING REPORTING PROCEDURES

FREQUENCY OF MONITORING

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Asbestos compliance monitoring is currently slated to be conducted on a part-time basis, 2 to 3 days a week, with the option to be full-time as the abatement work requires. During the first couple weeks of initial abatement at the site, compliance monitoring will likely be provided on a full-time basis to become familiar with the abatement subcontractor, their planned approaches (including any planned innovative abatement techniques), and to become familiar with the initial group of structures planned for abatement.

ROUTINE REPORTING

Routine reporting requirements will consist of completing a compliance monitoring summary report for each day (or portion of a day) on the site. A standard reporting form will be utilized for the daily compliance monitoring report. An example form is attached as Figure 2. This is the form that was utilized during the Rapid Response abatement and demolition work conducted by USACE-Omaha during the winter/spring of 1995. If requested by EPA, this form will be revised prior to the initiation of the MK scope of work.

Submittal of the routine daily reports will be as follows:

1. If no reportable incidents or deviations from the approved abatement work plan occur, the daily reports will be accumulated over a week's period of monitoring and will then be submitted on Friday of the week being reported to the following people. Preferably, the week's report forms should be faxed (or hand delivered for local staff), with hard copies mailed as follow-ups to the faxed copies.

• Armina Nolan
Region 10 Compliance Officer
U.S. Environmental Protection Agency
1200 6th Ave (AT-082)
Seattle, WA 98101
(206) 553-1757 (phone)
(206) 553-0110 (fax)

• Earl Liverman
U.S. Environmental Protection Agency
2110 Ironwood Parkway
Coeur d'Alene, ID 83814-2648
(208) 664-4858 (phone)
(208) 769-1404 (fax)
(or alternatively, Earl's copies can be left at the Superfund Project Office in Kellogg to his attention).

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- Mike Mahoney
U.S. Army Corps of Engineers
1005 McKinley Avenue
Kellogg, ID 83837
(208) 386-5203 (phone)

2. Laboratory results from potential ACM material or air monitoring samples will be forward to Armina Nolan and Earl Liverman after the completion of the laboratory tests. The laboratory results form will reference the specific daily report when the samples were obtained.
3. In addition to the written daily compliance reporting forms, the Converse-Bison compliance monitor shall provide verbal reports to the EPA OSC (Liverman) and to the USACE resident engineer (Mahoney) at the completion of each day monitored. If neither of these designated people are available, phone messages will be utilized.

INCIDENT REPORTING

If an incident occurs during abatement that is potentially out of compliance with the NESHAP regulations or if significant deviations occur from procedures outlined in the approved asbestos abatement work plan, the compliance monitor shall report the potential incident in accordance with the following procedures:

Initial Notification of Potential Incidents

1. Immediately notify the EPA OSC (Earl Liverman). If Earl can not be directly reached either at the site or in Coeur d'Alene, a phone message shall be used to describe the potential incident. If Earl is not reached directly, the second EPA contact is Howard Blood (206-553-1172). If Howard can not be reached directly, the third EPA contact is Sean Sheldrake (206-553-1220).
2. Immediately notify the EPA Air Compliance Officer (Armina Nolan). If Armina can not be reached directly, a phone message will be left describing the incident.
3. Phone conversation records shall be maintained by the compliance monitor for all phone calls to report potential incidents,
4. *{Question to reviewers of this draft: How would EPA like the USACE to be notified? Via EPA OSC? Or directly from Converse's compliance monitor?}*

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Mark?

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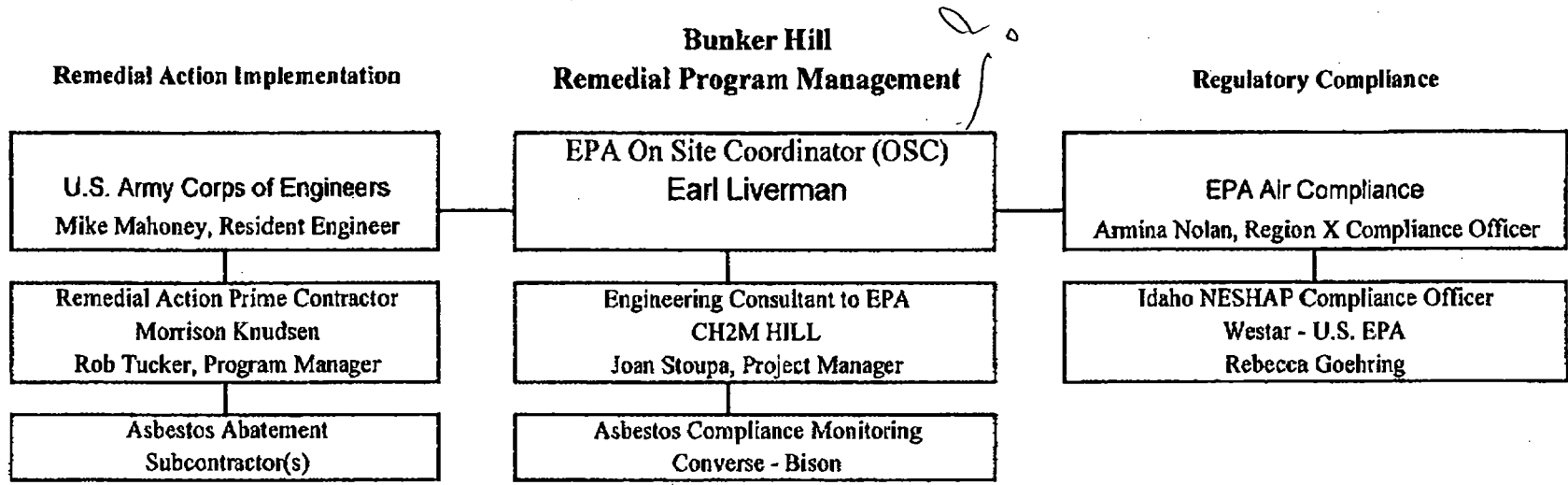
Written Notification of Potential Incident

1. After providing verbal notification to the above-referenced persons, the compliance monitor shall complete and fax the daily reporting form describing the incident directly to EPA (Liverman and Nolan) (or to the second and third EPA contacts identified above if Earl Liverman is not available).

Follow-Up on Potential Incident

1. After reporting a potential incident, the compliance monitor shall maintain, at a minimum, daily contact via phone conversations with EPA (Liverman and Nolan) as necessary to describe the contractor's mitigative responses to the causes of the incident. Follow-up contact with EPA shall continue until EPA is satisfied that the incident has been corrected.

* * * *



Project Organization
Asbestos Abatement Compliance Monitoring
Bunker Hill Superfund Site